

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
ST. JOSEPH DIVISION**

KAREN BACKUES KEIL,)	
)	
Plaintiff,)	
)	
v.)	Case No. 5:18-CV-06074-BP
)	Consolidated with three additional cases
)	
EDWARD BEARDEN,)	
)	
Defendant.)	

REQUEST FOR WRIT OF HABEAS CORPUS AD TESTIFICANDUM

Plaintiffs Karen Keil, Ashley Zieser, Lynnsey Betz and Jane Doe (“Plaintiffs”) respectfully petition this Court to issue a Motion for a Writ of Habeas Corpus Ad Testificandum for inmate-witness Teri Dean, DOC ID 1153665. In support of this Petition, Plaintiffs state as follows:

1. This Court has the authority and discretion to issue a writ of habeas corpus ad testificandum where an inmate-witness’s testimony is relevant and necessary to the pending action. 28 U.S.C. §§ 1651(a) and 2241(c)(5).
2. Inmate-Witness Teri Dean, DOC ID 1153665, is currently confined at Women’s Eastern Reception, Diagnostic and Correction Center at 1101 East Highway 54, Vandalia, MO 63382.
3. The presence of Teri Dean is necessary to give testimony in this lawsuit.
4. This is an action pursuant to 42 U.S.C. § 1983, in which the Plaintiffs seek compensatory damages and punitive damages against Defendant(s) for violations of their constitutional rights while acting under color of state law, together with reasonable attorney’s fees and costs pursuant to 42 U.S.C. § 1988.

5. In summary, Plaintiffs' allegations against Defendant(s) are that the Defendant Corrections Officer(s) harassed, abused, and sexually assaulted all Plaintiffs during their confinement at the Chillicothe Correctional Center in Missouri, roughly between June 2011 and October 2018. Ms. Dean's allegations against at least one of the same Defendant(s) are consistent with and establish proof of the claims of the Plaintiffs in the instant consolidated case pursuant to FRE 415.

6. Ms. Dean's testimony is therefore relevant, necessary and required for trial of these cases.

WHEREFORE, Plaintiffs respectfully request that the Clerk of the Court be directed to issue a certified Writ of Habeas Corpus Ad Testificandum commanding the Missouri Department of Corrections at Women's Eastern Reception, Diagnostic and Correction Center, Angela Mesmer, to produce Teri Dean, Inmate ID 1153665, in the United States District Courthouse in Kansas City, Missouri, on April 26, 2022, and continuing for such time as necessary.

Respectfully submitted,

/s/ Jenifer C. Snow

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Writ of Habeas Corpus Ad Testificandum has been served upon counsel of record by means of the Court's electronic filing system this 5th day of April 2022.

/s/ Jenifer C. Snow